

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

F. E. Wheaton and Company
Attn: Jeff Brown
204 West Wheaton Drive
Yorkville, Illinois 60560

Application No.: 97010015
Applicant's Designation: FLOWCOAT
Subject: Flowcoaters
Date Issued: May 7, 2002
Location: 204 West Wheaton Drive, Yorkville

I.D. No.: 093801AAM
Date Received: April 18, 2002
Expiration Date: May 23, 2005

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five flowcoaters and one drying oven pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for any single hazardous air pollutant (HAP), and 25 tons/year for all HAPs combined). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions of VOM and operation of the five flowcoaters and one drying oven shall not exceed the following limits:

VOM Usage		VOM Emissions	
(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
11.0	95.0	11.0	95.0

These limits define the potential emissions of VOM and are based on maximum coating, solvent, and additive usages, maximum VOM content, and limits as requested by the company. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

3. Pursuant to 35 Ill. Adm. Code 215.204(1), the types of coatings applied in the five flow coaters shall not exceed the following lb VOM/gallon of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator:

<u>Coating</u>	<u>VOM Content (Lb VOM/Gal)</u>
Opaque Stain	4.7
Non-Topcoat Pigmented Coat	5.0
Semi-Transparent Stain	6.6
Sealer	5.6

4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
5. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
6. The Permittee shall maintain monthly records of the following items:
 - a. Amount of each coating, solvent, and additive used on all flow coaters (tons/month and tons/year);
 - b. VOM and HAP content of each coating, solvent, and additive used on all flow coaters (lb VOM/gallon or weight percent);
 - c. Calculations of VOM emissions. The following equations shall be used to calculate VOM emissions:

$$Te = \sum_{i=1}^n A_i B_i$$

Where:

Te = Total VOM emissions from all coating lines each month in units of lbs/month or tons/month;

n = Number of different coatings, solvent, and additive as applied each month on all coating lines;

i = Subscript denoting an individual coating, solvent, and additive;

A_i = Weight of VOM per volume of each coating, solvent, and additive as applied each month on all coating lines in units of lbs VOM/gallon; and

B_i = Volume of each coating, solvent and additive as applied each month on all coating lines in units of gallons/month.

- d. Calculations of each individual HAP emissions.
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
- and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: coating, solvent and additive usage, coating, solvent and additive VOM content and HAP weight percent, and calculations of VOM and HAP emissions from the prior calendar year. If there has been no exceedance of a

requirement of this permit during the prior calendar year, the annual emission report shall contain a statement to that effect.

It should be noted that the fuel combustion emissions from the drying oven are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(fff).

It should be noted that this permit has been revised to incorporate Construction Permit #02040067 to include the operations of a flow coater without any increase in VOM emissions from the current permit limits.

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:TNE:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Coating Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

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